

One Firm Worldwide<sup>SM</sup>**PRIVILEGED & CONFIDENTIAL****MEMORANDUM**

**TO:** Jim Rowader, Minneapolis City Attorney

**FROM:** Jones Day

**DATE:** June 4, 2021

**RE:** Department of Justice Pattern and Practices Investigation - Minneapolis

In anticipation of Jones Day being retained to represent the City of Minneapolis in connection with the Department of Justice's investigation into the pattern and practices of the City of Minneapolis and the Minneapolis Police Department, Jones Day has prepared this document, which summarizes various work streams and who will be responsible for each work stream.

This document is confidential and has been prepared exclusively for the use of the City of Minneapolis, and is protected by the attorney-client privilege. In addition, this document was prepared in anticipation of potential civil, administrative or criminal litigation, and it is protected from disclosure by the work product doctrine.

		<b>Action By:</b>
Work Stream I:	Respond to subpoenas and other document requests issued by the Department of Justice	<b>Jones Day</b>
Work Stream II:	Prepare for / attend interviews of City employees, DOJ site visits	<b>Jones Day</b>
Work Stream III:	Meet with community stakeholders regarding potential reforms	<b>Jones Day</b>
Work Stream IV:	Proactively brainstorm potential reforms	<b>Jones Day &amp; Wilmer Hale</b>
Work Stream V:	Participate in meetings regarding DOJ findings / report; draft any statements to be issued jointly by DOJ and the City; negotiate consent decree / reform agreements	<b>Jones Day</b>

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Work Stream VI:	Represent the City in any court proceedings (if needed)	<b>Jones Day</b>
Work Stream VII	Provide strategic counsel to the City Attorney	<b>Wilmer Hale</b>



## Billing Policies for Disbursements and Charges

**Computer Research Services.** Clients are billed actual charges for on-line computer research done in connection with specific client/matters. Clients are not charged for Bloomberg Law, Lexis or Westlaw services.

**Copying.** Copying charged to the client includes documents, exhibits, and other papers that are filed with a court or administrative agency; documents produced for the client at its request and/or convenience; and documents produced as may be required by other parties in relation to litigation or transactions. Clients are billed \$.20 per page for non-color photocopying and \$1.00 per page for color photocopying done at the Firm. The actual charges to the Firm for outside, third-party duplication services used for specific client matters are billed to the client. Documents required for the Firm's use only are not charged to clients.

**Courier Services.** The Firm utilizes an overnight "pouch" service among its offices, both foreign and domestic; clients are not charged for deliveries through the pouch service. Courier services such as Federal Express are used when the circumstances of specific client matters dictate the need for such service. Clients are billed for the actual charges to the Firm for any such courier service.

**Electronic Databases.** Clients are billed actual charges from the external vendor hosting services we use to store and maintain computer databases and electronic versions of such materials as court filings, transcripts, case dockets and calendars, correspondence, discovery materials, and deposition or trial exhibits. The Firm does not maintain such electronic databases internally.

**Food Services.** When food services are required to enhance the efficient handling of specific client matters, clients are billed the actual cost of the food and/or beverages plus the expense of the food service personnel or service providers who serve the food and/or beverages. It will be the client's responsibility to apply the deduction limitation under IRS Sec. 274(e)3 for these charges.

**Messenger Services.** Clients are billed for messenger services required for specific client matters at the actual rates charged by outside delivery services or the Firm's out-of-pocket expenses for bus fares, cabs, and similar items when Firm personnel are used.

**Postage (U.S. Mail).** Clients are not charged for postage when the amount on a particular mailing is less than \$1.00. Standard rates are billed for all postage over \$1.00 and for large mailings done on behalf of the client even when individual item postage is under \$1.00 as well as for special postal services, e.g., Express Mail, Special Delivery, and Certified and Registered Mail.

**Special Services.** A client and the Firm may agree that certain special services are required, in connection with a specific matter, such as litigation support, extraordinary office supplies, temporary agency paralegals, project assistants or other staffing, video/audio production services/equipment, off-site location, imaging services, off-hour HVAC and related expenses, and document production services requiring trained personnel and specialized equipment. Before the client is billed for any such services, the client and Firm must agree on the type, scope, and cost of the services.

**Staff Overtime.** Staff overtime costs are billed to clients only when the overtime staff services are for the convenience of the client, rather than the convenience of the Firm. In such circumstances, clients are billed for the Firm's costs of providing the staff overtime, including actual overtime compensation (and a factor for benefits expenses) and necessary meal and transportation costs.

**Travel.** Clients are billed for travel charges (including, for U.S. travel, a \$40.00 transaction charge covering a portion of the contracted cost of arranging air travel) incurred by Firm personnel for specific client matters. For domestic travel, we use coach fare only unless the client has authorized first or business class. We expect our lawyers to incur only reasonable meal, lodging, and other travel costs.

**Other Charges.** We prefer that third-party charges (e.g., consultants, court reporters, etc.) incurred on behalf of a client be billed directly to the client by the third party. If this is not possible, such charges are passed through at cost.